



## Missouri Department of Elementary and Secondary Education

— Making a positive difference through education and service —

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### Guidance Letter

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To: SPOE Staff, On-going Service Coordinators, Service Providers

From: Margaret Strecker, Assistant Director, Special Education Compliance

Subject: General Supervision/Monitoring of providers and service coordinators

The Missouri DESE is required to oversee all service providers and coordinators in accordance with federal law. DESE provides this oversight through a number of general supervision activities, including compliance monitoring. Each year the DESE must report to the Office of Special Education Programs (OSEP) the state's performance in specific areas in a document called the Annual Performance Report (APR), paying special attention to areas where the state has previously been found out of compliance.

One such area addressed in Missouri's current APR relates to enhancing procedures for providing general supervision (including compliance monitoring) of all entities within the First Steps system and specifically early intervention providers and service coordinators.

**It is important that early intervention providers, including service coordinators are aware of the procedures that are currently in place to provide general supervision and compliance monitoring for these entities and also the new procedures that will affect them in the near future.**

**It should also be remembered that service coordinator and provider contracts specifically require contractors to be knowledgeable of and abide by all applicable federal, state and local laws, rules, regulations, and policies related to First Steps.**

As outlined in the following list, DESE already has in place a number of strategies for providing general supervision of providers. More detailed information is available under the General Supervision section of the APR. The APR Report is located at:  
<http://dese.mo.gov/divspeced/DataCoord/APRprtC04.html>

General Supervision components in place:

- Contractual and enrollment requirements
- Review procedures for claims of billing inaccuracy (If problems are confirmed actions are taken to recover funds.)
- Formal complaint and informal issues procedures
- Data collection and review process
- Phase I contractual changes

Following are additional components of general supervision that are being put in place in the near future:

- New web-based data system will allow for detailed review of child's record locally and at the state level and help ensure compliance through reminders and requirements within the system.
- Review of files using IFSP Quality Indicators Rating Scale will begin with Phase I SPOEs and will later be integrated into statewide monitoring procedures. This will help move beyond a compliance level review of the IFSP and help move toward IFSPs that are consistent with the intent of Part C and Missouri's philosophy for the system.
- **Monitoring of service providers will begin June 2005. Summer 2005 on-site follow-up reviews, future follow-up reviews and cyclical monitoring which will be scheduled every three years will address ongoing service coordinator and provider issues.**
  - Compliance issues for **early intervention providers**:
    - implementing services in accordance with the IFSP
    - completing and submitting evaluation reports in a timely manner
    - submitting complete and timely monthly progress reports
  - Compliance issues for **ongoing service coordinators**:
    - Parental consent for exchange of personally identifiable information
    - Prior written notice and consent
    - Written notification of IFSP meetings
    - IFSP content
    - Transition planning in accordance with state regulations
    - Timely IFSP meetings
    - Performing all required service coordinator activities described in regulations including:
      - Coordinating performance of assessments
      - Assisting families in identifying available providers
      - Coordinating and monitoring the delivery of available services (includes regular contacts with families, monitoring of provider progress notes to ensure services are being implemented in accordance with the IFSP, and if not, that provider issues are resolved – compensatory services are addressed, where appropriate)
      - Informing families of the availability of advocacy services

- Coordinating with medical and health providers

NOTE:

- Timely and thorough case notes are critical.
  - Transmission of all required documentation for the child's early intervention record to the SPOE in a timely fashion is also critical.
- Monitoring will include not only file reviews, but also interviews with SPOE staff, parents, providers, ongoing service coordinators. Some individuals will be selected at random for interview, and some interviews will be scheduled to address specific issues identified prior to the monitoring visit.
  - Corrective actions will be required for identified non-compliance. Technical assistance will be provided as necessary, with the intent helping correct non-compliance within one year. Sanctions will be imposed if necessary to correct persistent non-compliance.
  - Off-cycle monitoring visits or desk reviews may also be scheduled as needed to address concerns identified through a comprehensive data review process.

Providing general supervision and compliance monitoring related to the requirements of IDEA is part of a continuous improvement process. Procedures and outcomes will be assessed and revised as necessary on an ongoing basis to meet the evolving changes in federal requirements and identified successes and challenges at the state and local levels.